

STATE OF OHIO)
)ss.
COUNTY OF CUYAHOGA)

AFFIDAVIT

I, SARAH S. GRAHAM, having been duly sworn and deposed according to law, hereby states the following:

1. My name is Sarah S. Graham and I am at least 18 years of age, of sound mind and I am competent to testify to all matters herein.

2. I am an attorney duly licensed to practice law in the State of Ohio both in Ohio state courts as well as in the U.S. District Court, Northern District of Ohio.

3. I am the attorney of record for Plaintiffs in the case known as *BVG Properties, LLC, et al. v. City of Cleveland, et al.*, Case No. 1:25-CV-00430, currently pending in the United States District Court for the Northern District of Ohio, Eastern Division.

4. Defendants City of Cleveland and Sally Martin aka Sally Martin O'Toole requires all owners to use the online portal to apply for rental registrations and to pay the rental registration fees.

5. On February 11, 2025, I navigated through the entire online rental registration application through the point of entering payment information.

6. The online portal is available at <https://aca-prod.accela.com/COC/default.aspx>.

7. On March 22, 2025, I went back through the entire online rental registration application via the online portal through the point of payment.

8. A copy of the online rental registration application is attached hereto as Affidavit Exhibit A.

9. The pages of the online rental registration application that have the date at the top of the page are print outs of the application pages themselves.

10. If the specific application page includes the option to "add new" or includes a drop down selection, the page after that specific application page reflects the screenshots of what appears when "add new" is selected and/or what options appears when the applicant selects the drop down.

11. Pages one, two, three, four, seven and 10 of the attached online rental registration application reflect how each application page appears before any questions are answered.

12. Pages 12 through 20 reflect the additional questions that are asked depending on how the applicant answers the questions set forth on page 10 of the application.

13. After saving blank copies of pages one through 10 of the online rental registration application, random answers were entered in order to advance through the entire application and that is why beginning on page 21 information appears as to address, parcel, owner etc.

FURTHER AFFIANT SAYETH NAUGHT.




SARAH S. GRAHAM

Subscribed and sworn to me, a notary public, in my presence and for said county and state this 25 day of March, 2025.



Edward Aragon
Resident Summit County
Notary Public, State of Ohio
My Commission Expires: 5-26-29


NOTARY PUBLIC